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July 31, 2020

BY ECF

Honorable James Orenstein
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Galloway v. County of Nassau, et al.*, 19 CV 5026 (AMD) (JO)

Your Honor:

I represent plaintiff in the above-referenced matter. I write to respectfully request an extension of plaintiff's Rule 16 deadline to amend the complaint from August 3, 2020 until August 27, 2020. The Village of Hempstead defendants consent to this application. As of this writing, the Nassau County defendants have not responded to plaintiff's requests that they provide their position.

If it should please the Court, plaintiff has received two previous extensions of his amendment deadline. *See* DE #65 and order dated May 28, 2020; DE #71 and order dated June 11, 2020. Those extensions were sought to allow plaintiff the opportunity to review defendants' discovery responses before drafting any amendment. The instant third application is respectfully submitted for the same reason: plaintiff has consented to defendants' request to extend their response deadline until August 20, 2020 and would like the opportunity to review those responses before preparing his amendment.

The only deadline that this request may affect is the briefing schedule for defendants' potential motion to dismiss. *See* DE #72 and order dated June 11, 2020. We anticipate that defendants may file a letter with the presiding District Judge to seek alteration of that schedule, if they deem it necessary.

Hon. James Orenstein

July 31, 2020

Accordingly, plaintiff respectfully requests an extension of his Rule 16 amendment deadline from August 3, 2020 until August 27, 2020.

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'G. Harvis', written over the typed name.

Gabriel P. Harvis

cc: Defense Counsel